

1 PARKER | SCHEER LAGOMARSINO
2 ANDRE M. LAGOMARSINO, ESQ.
3 Nevada Bar No. 6711
4 9555 South Eastern Avenue, Suite 210
5 Las Vegas, Nevada 89123
Telephone: (702) 383-2864
Facsimile: (702) 383-0065
Attorney for Plaintiffs

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 VALERIE HIRATA; WHITNIE TAYLOR; and
9 ANGELA JONES

CASE NO.: 2:13-cv-02302-LDG-VCF

10 Plaintiffs,

11 v.

12 SOUTHERN NEVADA HEALTH DISTRICT, a
13 political subdivision of Clark County, Nevada;
14 GLENN SAVAGE, in both his individual and
15 official capacity; AMY IRANI, in both her
16 individual and official capacity; SUSAN LABAY,
17 in both her individual and official capacity;
18 JACQUELYN RAICHE-CURL, in both her
19 individual and official capacity; ANGUS
MACEACHERN, in both his individual and
official capacity; ROBERT GUNNOE, in both his
individual and official capacity; KIM
DIPASQUALE, in both her individual and official
capacity; LAWRENCE SANDS, in both his
individual and official capacity;

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STIPULATION AND ORDER TO
EXTEND TIME TO COMPLETE
DISCOVERY PURSUANT TO LR 26-4
(FIFTH REQUEST)

23 Defendants.

24 Pursuant to LR 26-4, the parties, by and through their respective counsel of record, for good
cause, and hereby stipulate to extend the discovery deadlines in the above-entitled matter by one
hundred fifty (150) days up to including March 3, 2016. The parties state the following:

PARKER SCHEER LAGOMARSINO
 9555 South Eastern Avenue, Suite 210 • Las Vegas, Nevada 89123
 Telephone (702) 383-2864 Facsimile (702) 383-0065

1. **Statement specifying discovery completed:**

2	<u>DOCUMENT</u>	<u>DATE</u>	<u>PARTY</u>
3	Notice of LR 26-1 Conference	02/26/14	PSL
4	Plaintiffs' Initial Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	02/28/14	PSL
5	Plaintiffs' First Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/07/14	PSL
6	Plaintiffs' Second Supplement to re-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/14/14	PSL
7	Defendants' Fed. R. Civ. P. 26(f) Production	03/14/14	Olson/Cannon
8	Plaintiffs' Third Supplement to re-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/21/14	PSL
9	Plaintiffs' Fourth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/25/14	PSL
10	Plaintiffs' Fifth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/28/14	PSL
11	Plaintiffs' Sixth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	04/04/14	PSL
12	Plaintiffs' First Set of Request for Production of Documents to Defendant Southern Nevada Health District	04/04/14	PSL
13	Plaintiffs' First Set of Request for Production of Documents to Defendants angus MacEachern, Lawrence Sands, Kim DiPasquale and Robert Gunnoe	04/08/14	PSL
14	Plaintiffs' First Set of Request for Production of Documents to Defendants Glenn Savage, Rose Henderson, Amy Irani, Susan LaBay, Jacque Raiche-Curl, Lorraine Forston, Robert Newton and Cara Evangelista	04/08/14	PSL
15	Defendants Southern Nevada Health District, Angus MacEachern, Lawrence Sands, Kim DiPasquale, and Robert Gunnoe's Initial Disclosures	04/10/14	Fisher/Phillips

PARKER SCHEER LAGOMARSINO
 9555 South Eastern Avenue, Suite 210 • Las Vegas, Nevada 89123
 Telephone (702) 383-2864 Facsimile (702) 383-0065

1	Plaintiffs' Seventh Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	04/11/14	PSL
2	Plaintiffs' Eighth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	04/18/14	PSL
3	Plaintiffs' Ninth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	04/18/14	PSL
4	Certificate of Service	05/01/14	PSL
5	Plaintiffs' Tenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	05/05/14	PSL
6	Defendants' Responses to First Set of Request for Production of Documents to defendants Glenn Savage, Rose Henderson, Amy Irani, Susan LaBay, Jacque Raiche-Curl, Lorrain Forston, Robert Newton, an Cara Evangelista	05/12/14	Olson/Cannon
7	Plaintiffs' Notice of Issuance of Subpoena for Production of Documents	05/15/14	PSL
8	Plaintiff's Eleventh Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	05/16/14	PSL
9	Affidavit of Service	05/22/14	PSL
10	Defendant Southern Nevada Health District's Responses to Plaintiffs' First Set of Request for Production of Documents	05/27/14	Fisher/Phillips
11	Defendants Angus MacEachern, Lawrence Sands, Kim DiPasquale, and Robert Gunnoe's Responses to Plaintiffs' First Set of Request for Production of Documents	05/27/14	Fisher/Phillips
12	Defendant Angus MacEachern's First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Fisher/Phillips
13	Defendant Southern Nevada Health District's First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Fisher/Phillips
14	Defendant Robert Gunnoe's First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Fisher/Phillips

PARKER SCHEER LAGOMARSINO
 9555 South Eastern Avenue, Suite 210 • Las Vegas, Nevada 89123
 Telephone (702) 383-2864 Facsimile (702) 383-0065

1	Defendant Lawrence Sands' First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Fisher/Phillips
2	Defendant Angus MacEachern's First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Fisher/Phillips
3	Defendant Kim DiPasquale's First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Fisher/Phillips
4	Defendant Southern Nevada Health District's First Set of Interrogatories to Plaintiff Whitnie Taylor	05/30/14	Fisher/Phillips
5	Defendant Angus MacEachern's First Set of Interrogatories to Plaintiff Whitnie Taylor	05/30/14	Fisher/Phillips
6	Defendant Robert Gunnoe's First Set of Interrogatories to Plaintiff Whitnie Taylor	05/30/14	Fisher/Phillips
7	Defendant Lawrence Sands' First Set of Interrogatories to Plaintiff Whitnie Taylor	05/30/14	Fisher/Phillips
8	Defendant Kim DiPasquale's First Set of Interrogatories to Plaintiff Whitnie Taylor	05/30/14	Fisher/Phillips
9	Defendant Kim DiPasquale's First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Fisher/Phillips
10	Defendant Lawrence Sands' First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Fisher/Phillips
11	Defendant Robert Gunnoe's First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Fisher/Phillips
12	Defendant Southern Nevada Health District's First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Fisher/Phillips
13	Plaintiffs' Twelfth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	06/09/14	PSL
14	Plaintiffs' Notice of Taking Videotaped Depositions (All Defendants)	06/18/14	PSL
15	Defendants' Responses to First Set of Request for Production of Documents to Defendants Glenn Savage, Rose Henderson, Amy Irani, Susan LaBay, Jacque Raiche-Curl, Lorraine Forston, Robert Newton and Cara Evangelista (First Supplement)	06/23/14	Olson/Cannon
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PARKER SCHEER LAGOMARSINO
 9555 South Eastern Avenue, Suite 210 • Las Vegas, Nevada 89123
 Telephone (702) 383-2864 Facsimile (702) 383-0065

1	Plaintiffs' Responses to Southern Nevada Health District's Request for Production of Documents	07/07/14	PSL
2	Plaintiffs' Thirteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	07/22/14	PSL
3	Plaintiffs' Fourteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	07/30/14	PSL
4	Plaintiff Valerie Hirata's Answers to Defendant Southern Nevada Health District's First Set of Interrogatories	07/30/14	PSL
5	Plaintiff Valerie Hirata's Answers to Defendant Lawrence Sands' First Set of Interrogatories	07/30/14	PSL
6	Plaintiff Valerie Hirata's Answers to Defendant Angus MacEachern's First Set of Interrogatories	07/30/14	PSL
7	Plaintiff Valerie Hirata's Answers to Defendant Robert Gunnoe's First Set of Interrogatories	07/30/14	PSL
8	Plaintiff Valerie Hirata's Answers to Defendant Kim DiPasquale's First Set of Interrogatories	07/30/14	PSL
9	Plaintiff Angela Jones' Answers to Defendant Southern Nevada Health District's First Set of Interrogatories	07/30/14	PSL
10	Plaintiff Angela Jones' Answers to Defendant Lawrence Sands' First Set of Interrogatories	07/30/14	PSL
11	Plaintiff Angela Jones' Answers to Defendant Angus MacEachern's First Set of Interrogatories	07/30/14	PSL
12	Plaintiff Angela Jones' Answers to Defendant Robert Gunnoe's First Set of Interrogatories	07/30/14	PSL
13	Plaintiff Angela Jones' Answers to Defendant Kim DiPasquale's First Set of Interrogatories	07/30/14	PSL
14	Plaintiff Whitnie Taylor's Answers to Defendant Southern Nevada Health District's First Set of Interrogatories	07/30/14	PSL
15	Plaintiff Whitnie Taylor's Answers to Defendant Lawrence Sands' First Set of Interrogatories	07/30/14	PSL

PARKER SCHHEEL LAGOMARSINO
 9555 South Eastern Avenue, Suite 210 • Las Vegas, Nevada 89123
 Telephone (702) 383-2864 Facsimile (702) 383-0065

1	Plaintiff Whitnie Taylor's Answers to Defendant Angus MacEachern's First Set of Interrogatories	07/30/14	PSL
2	Plaintiff Whitnie Taylor's Answers to Defendant Robert Gunnoe's First Set of Interrogatories	07/30/14	PSL
3	Plaintiff Whitnie Taylor's Answers to Defendant Kim DiPasquale's First Set of Interrogatories	07/30/14	PSL
4	Defendant Southern Nevada Health District's Second Set of Interrogatories to Plaintiffs	08/06/14	Fisher/Phillips
5	Defendant Southern Nevada Health District's Second Requests for Production of Documents to Plaintiffs	08/06/14	Fisher/Phillips
6	Plaintiffs' Fifteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	09/03/14	PSL
7	Defendants': G. Savage, R. Henderson, A. Irani, S. LaBay, J. Raiche-Curl, L. Forston R. Newton and C. Evangelista Initial Disclosures (Second Supplement)	09/09/14	Olson/Cannon
8	Plaintiffs' Sixteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	09/09/14	PSL
9	Deposition of Lorraine Forston, Vol 1	09/10/14	PSL
10	Plaintiffs' Answers to Southern Nevada Health District's Second Set of Interrogatories	09/15/14	PSL
11	Plaintiffs' Responses to Southern Nevada Health District's Second Request for Production of Documents	09/15/14	PSL
12	Plaintiffs' Seventeenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	09/15/14	PSL
13	Plaintiffs' First Supplemental Responses to Southern Nevada Health District's First Request for Production of Documents	09/15/14	PSL
14	Defendants': G. Savage, R. Henderson, A. Irani, S. LaBay, J. Raiche-Curl, L. Forston R. Newton and C. Evangelista Initial Disclosures (Third Supplement)	09/18/14	Olson/Cannon
15	Deposition of Robert Gunnoe	09/19/14	PSL

PARKER SCHEER LAGOMARSINO
 9555 South Eastern Avenue, Suite 210 • Las Vegas, Nevada 89123
 Telephone (702) 383-2864 Facsimile (702) 383-0065

1	First Supplement to Defendants Southern Nevada Health Districts, Angus MacEachern, Lawrence Sands, Kim DiPasquale, and Robert Gunnoe's Initial Disclosures	09/23/14	Fisher/Phillips
2	Plaintiffs' Third Set of Request for Production of Documents to Defendant Southern Nevada Health District	10/07/14	PSL
3	Plaintiffs' Eighteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	10/17/14	PSL
4	Deposition of Lawrence Sands	10/20/14	PSL
5	Deposition of Robert Newton	10/22/14	PSL
6	Deposition of Lorraine Forston, Vol II	10/23/14	PSL
7	Defendants': G. Savage, R. Henderson, A. Irani, S. LaBay, J. Raiche-Curl, L. Forston R. Newton and C. Evangelista Initial Disclosures (Fourth Supplement)	11/10/14	Olson/Cannon
8	Plaintiffs' Nineteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	11/12/14	PSL
9	Deposition of Rose Henderson	11/13/14	PSL
10	Deposition of Susan Leaverton	11/19/14	PSL
11	Deposition of Amy Irani	11/20/14	PSL
12	Plaintiffs' First Set of Interrogatories to Defendant Southern Nevada Health District	12/12/14	PSL
13	Defendant Southern Nevada Health District's Third Request for Production of Documents to Plaintiffs	12/24/14	Fisher/Phillips
14	Defendant Southern Nevada Health District's Third Set of Interrogatories to Plaintiff Valerie Hirata	12/24/14	Fisher/Phillips
15	Defendant Southern Nevada Health District's Third Set of Interrogatories to Plaintiff Angela Jones	12/24/14	Fisher/Phillips
16	Defendant Southern Nevada Health District's Third Set of Interrogatories to Plaintiff Whitnie Taylor	12/24/14	Fisher/Phillips

PARKER SCHEER LAGOMARSINO
 9555 South Eastern Avenue, Suite 210 • Las Vegas, Nevada 89123
 Telephone (702) 383-2864 Facsimile (702) 383-0065

1	Plaintiffs' Twentieth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	01/06/15	PSL
2	Deposition of Jacque Raiche-Curl	01/07/15	PSL
3	Plaintiffs' Twenty-first Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	01/26/15	PSL
4	Plaintiff Whitnie Taylor's Answers to Defendant Southern Nevada Health District's Third Set of Interrogatories	01/21/15	PSL
5	Plaintiff Angela Jones' Answers to Defendant Southern Nevada Health District's Third Set of Interrogatories	01/21/15	PSL
6	Defendant Southern Nevada Health District's Answers to Plaintiffs' First Set of Interrogatories	01/22/15	Fisher/Phillips
7	Plaintiff Valerie Hirata's Answers to Defendant Southern Nevada Health District's Third Set of Interrogatories	01/25/15	PSL
8	Plaintiffs' Responses to Defendant Southern Nevada Health District's Third Request for Production of Documents to Plaintiffs	01/26/15	PSL
9	Glenn Savage's Request for Admissions to Valerie Hirata	03/03/15	Olson/Cannon
10	Glenn Savage's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon
11	Defendants' Request for Production of Documents to Valerie Hirata	03/03/15	Olson/Cannon
12	Amy Irani's Request for Admissions to Valerie Hirata	03/03/15	Olson/Cannon
13	Amy Irani's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon
14	Susan LaBay's Request for Admissions to Valerie Hirata	03/03/15	Olson/Cannon
15	Susan LaBay's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon
16	Jacquelyn Raiche-Curl's Request for Admissions to Valerie Hirata	03/03/15	Olson/Cannon
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 9555 South Eastern Avenue, Suite 210 • Las Vegas, Nevada 89123
 Telephone (702) 383-2864 Facsimile (702) 383-0065

1	Jacquelyn Raiche-Curl's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon
2	Glenn Savage's Request for Admissions to Whitnie Taylor	03/03/15	Olson/Cannon
3	Glenn Savage's Interrogatories to Whitnie Taylor	03/03/15	Olson/Cannon
4	Defendants' Request for Production of Documents to Whitnie Taylor	03/03/15	Olson/Cannon
5	Amy Irani's Request for Admissions to Whitnie Taylor	03/03/15	Olson/Cannon
6	Amy Irani's Interrogatories to Whitnie Taylor	03/03/15	Olson/Cannon
7	Susan LaBay's Request for Admissions to Whitnie Taylor	03/03/15	Olson/Cannon
8	Susan LaBay's Interrogatories to Whitnie Taylor	03/03/15	Olson/Cannon
9	Jacquelyn Raiche-Curl's Request for Admissions to Whitnie Taylor	03/03/15	Olson/Cannon
10	Jacquelyn Raiche-Curl's Interrogatories to Whitnie Taylor	03/03/15	Olson/Cannon
11	Glenn Savage's Request for Admissions to Angela Jones	03/03/15	Olson/Cannon
12	Glenn Savage's Interrogatories to Angela Jones	03/03/15	Olson/Cannon
13	Defendants' Request for Production of Documents to Angela Jones	03/03/15	Olson/Cannon
14	Amy Irani's Request for Admissions to Angela Jones	03/03/15	Olson/Cannon
15	Amy Irani's Interrogatories to Angela Jones	03/03/15	Olson/Cannon
16	Susan LaBay's Request for Admissions to Angela Jones	03/03/15	Olson/Cannon
17	Susan LaBay's Interrogatories to Angela Jones	03/03/15	Olson/Cannon
18	Jacquelyn Raiche-Curl's Request for Admissions to Angela Jones	03/03/15	Olson/Cannon
19	Jacquelyn Raiche-Curl's Interrogatories to Angela Jones	03/03/15	Olson/Cannon

PARKER SCHEER LAGOMARSINO
 9555 South Eastern Avenue, Suite 210 • Las Vegas, Nevada 89123
 Telephone (702) 383-2864 Facsimile (702) 383-0065

1	Plaintiffs' Twenty-second Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/11/15	PSL
2	Deposition of Steven Goode, Vol 1	03/12/15	Fisher/Phillips
3	Deposition of Steven Goode, Vol 2	03/15/15	PSL
4	Plaintiffs' Notice of Vacating the Deposition of Tim Pangborn	03/17/15	PSL
5	Notice of Deposition – All Plaintiffs	04/03/15	Fisher/Phillips
6	Plaintiffs' Eleventh Amended Notice of Videotaped Deposition – Steven Goode	04/07/15	PSL
7	Notice of Deposition of Steve Goode	04/07/15	Fisher/Phillips
8	Defendant Southern Nevada Health District's Fourth Set of Interrogatories to Plaintiff Whitnie Taylor	04/09/15	Fisher/Phillips
9	Defendant Southern Nevada Health District's Fourth Set of Interrogatories to Plaintiff Valerie Hirata	04/09/15	Fisher/Phillips
10	Defendant Southern Nevada Health District's Fourth Set of Interrogatories to Plaintiff Angela Jones	04/09/15	Fisher/Phillips
11	Defendant Southern Nevada Health District's Fourth Request for Production of Documents to Plaintiffs' (NOS. 23-26)	04/09/15	Fisher/Phillips
12	Deposition of Steven Goode, Vol 3	04/20/15	PSL
13	Plaintiffs' Twenty-Third Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	04/20/15	PSL
14	Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action – MGM Grand Hotel LLC	04/22/15	PSL
15	Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action – Crescent Hotels & Resorts	04/22/15	PSL

PARKER SCHHEEL LAGOMARSINO
 9555 South Eastern Avenue, Suite 210 • Las Vegas, Nevada 89123
 Telephone (702) 383-2864 Facsimile (702) 383-0065

1	Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action– HRHH Hotel/Casino	4/22/15	PSL
2	Plaintiffs' Notice of Taking Depositions (Custodian of Records)	04/22/15	PSL
3	Notice of Deposition of Valerie Hirata	04/23/15	Fisher/Phillips
4	Notice of Deposition of Angela Jones	04/23/15	Fisher/Phillips
5	Notice of Deposition of Whitnie Taylor	04/23/15	Fisher/Phillips
6	Affidavit of Service – to HRHH Hotel/Casino	04/24/15	PSL
7	Affidavit of Service – to MGM Grand Hotel	04/24/15	PSL
8	Plaintiffs' Twenty-Fourth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	04/26/15	PSL
9	Proof of Service – Crescent Hotels & Resorts, LLC	04/30/15	PSL
10	Notice of Vacating Depositions	05/04/15	Fisher/Phillips
11	Amended Notice of Deposition of Whitnie Taylor	05/05/15	Fisher/Phillips
12	Amended Notice of Deposition of Angela Jones	05/05/15	Fisher/Phillips
13	Amended Notice of Deposition of Valerie Hirata	05/05/15	Fisher/Phillips
14	Plaintiffs' Twelfth Amended Notice of Videotaped Depositions	05/13/15	PSL
15	Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action	05/15/15	PSL
16	Plaintiff's Notice of Taking the Deposition of the Custodian of Records of Clark County Fire Dept.	05/15/15	PSL
17	Affidavit of Service - COR for Clark County Fire Dept.	5/19/15	PSL
18	Plaintiffs' Notice of Taking the Deposition of the Custodian of Records of Clark County Fire Department	05/20/15	PSL
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1	Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a civil Action	05/20/15	PSL
2	Plaintiffs' Thirteenth Amended Notice of Videotaped Depositions	05/20/15	PSL
3	Valerie Hirata's Responses to Amy Irani's Request for Admissions	05/20/15	PSL
4	Whitnie Taylor's Responses to Amy Irani's Request for Admissions	05/20/15	PSL
5	Angela Jones' Responses to Amy Irani's Request for Admissions	05/20/15	PSL
6	Valerie Hirata's Responses to Jacquelyn Raiche-Curl's Request for Admissions	05/20/15	PSL
7	Whitnie Taylor's Responses to Jacquelyn Raiche-Curl's Request for Admissions	05/20/15	PSL
8	Angela Jones' Responses to Jacquelyn Raiche-Curl's Request for Admissions	05/20/15	PSL
9	Valerie Hirata's Responses to Susan Labay's Request for Admissions	05/20/15	PSL
10	Whitnie Taylor's Responses to Susan Labay's Request for Admissions	05/20/15	PSL
11	Angela Jones' Responses to Susan Labay's Request for Admissions	05/20/15	PSL
12	Valerie Hirata's Responses to Glenn Savage's Request For Admissions	05/20/15	PSL
13	Whitnie Taylor's Responses to Glenn Savage's Request for Admissions	05/20/15	PSL
14	Angela Jones' Responses to Glenn Savage's Request for Admissions	05/20/15	PSL
15	Plaintiff Valerie Hirata's Answers to Defendant Jacquelyn Raiche-Curl's Interrogatories	05/20/15	PSL
16	Plaintiff Valerie Hirata's Answers to Defendant Susan Labay's Interrogatories	05/20/15	PSL
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 9555 South Eastern Avenue, Suite 210 • Las Vegas, Nevada 89123
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1	Plaintiffs Valerie Hirata's Answers to Defendant Amy Irani's Interrogatories	05/20/15	PSL
2	Plaintiff Valerie Hirata's Answers to Defendant Glenn Savage's Interrogatories	05/20/15	PSL
3	Plaintiff Angela Jones' Answers to Defendant Susan Labay's Interrogatories	05/20/15	PSL
4	Plaintiff Angela Jones' Answers to Defendant Jacquelyn Raiche-Curl's Interrogatories	05/20/15	PSL
5	Plaintiff Angela Jones' Answers to Defendant Amy Irani's Interrogatories	05/20/15	PSL
6	Plaintiff Angela Jones' Answers to Defendant Glenn Savage's Interrogatories	05/20/15	PSL
7	Plaintiffs Whitnie Taylor's Answers to Defendant Susan Labay's Interrogatories	05/20/15	PSL
8	Plaintiffs Whitnie Taylor's Answers to Defendant Glenn Savage's Interrogatories	05/20/15	PSL
9	Plaintiff Whitnie Taylor's Answers to Defendant Amy Irani's First Set of Interrogatories	05/20/15	PSL
10	Plaintiff Whitnie Taylor's Answers to Defendant Jacquelyn Raiche-Curl's Interrogatories	05/20/15	PSL
11	Whitnie Taylor's Responses to Defendant's Request for Production of Documents	05/20/15	PSL
12	Valerie Hirata's Responses to Defendants' Request for Production of Documents	05/20/15	PSL
13	Angela Jones' Responses to Defendants' Request for Production of Documents	05/20/15	PSL
14	Plaintiffs Twenty-Fifth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	05/20/15	PSL
15	Defendant Southern Nevada Health District's Supplemental Responses to Plaintiffs' Third Set of Request for Production of Documents	05/22/15	Fisher/Phillips
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1	Defendant Southern Nevada Health District's Supplemental Responses to Plaintiff's First Set of Request for Production of Documents	05/22/15	Fisher/Phillips
2	Affidavit of Service – COR for Clark County Fire Department	05/27/15	PSL
3	Plaintiffs Twenty-Sixth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	06/01/15	PSL
4	Deposition of Defendant Angus MacEachern	06/08/15	PSL
5	Plaintiff Valerie Hirata's Answers to Defendant Southern Nevada Health District's Fourth Set of Interrogatories	06/08/15	PSL
6	Plaintiff Angela Jones's Answers to Defendant Southern Nevada Health District's Fourth Set of Interrogatories	06/08/15	PSL
7	Plaintiff Whitnie Taylor's Answers to Defendant Southern Nevada Health District's Fourth Set of Interrogatories	06/08/15	PSL
8	Plaintiff's Responses to Defendant Southern Nevada Health District's Fourth Set of Request for Production of Documents (NOS. 23-26)	06/08/15	PSL
9	Plaintiffs' Notice of Objection to (1) Amended Notice of Deposition of Valerie Hirata; (2) Amended Notice of Deposition of Angela Jones and (3) Amended Notice of Deposition of Whitnie Taylor	06/08/15	PSL
10	Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action-Depo International, LLC	06/11/15	PSL
11	Plaintiff's Notice of Taking the Deposition of the Custodian of Records of Depo International, LLC	06/12/15	PSL
12	Deposition of Plaintiff Angela Jones, Vol 1	06/15/15	Fisher/Phillips
13	Deposition of Plaintiff Angela Jones, Vol 2	06/16/15	Fisher/Phillips
14	Deposition of Plaintiff Valerie Hirata, Vol 1	06/17/15	Fisher/Phillips
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1	Deposition of Plaintiff Valerie Hirata, Vol 2	06/18/15	Fisher/Phillips
2	Deposition of Plaintiff Whitnie Taylor	06/19/15	Fisher/Phillips
3	Affidavit of Service – Depo International, LLC	6/30/15	PSL
4	Defendants' Fed. R. Civ. P. 26(f) Production Sixth Supplement	07/14/15	Olson/Cannon
5	Plaintiffs' Notice of Vacating the Videotaped Deposition of Cara Evangelista	07/16/15	PSL
6	Plaintiffs' Twenty-Seventh Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	07/22/15	PSL
7	Deposition of Glenn Savage, Vol. 1	07/23/15	PSL

PARKER SCHEER LAGOMARSINO
 9555 South Eastern Avenue, Suite 210 • Las Vegas, Nevada 89123
 Telephone (702) 383-2864 Facsimile (702) 383-0065

12 **2. Specific description of discovery that needs to be completed:**

13 Plaintiffs and Defendants will retain and disclose expert witnesses, rebuttal expert disclosures,
 14 possible continued depositions of all Plaintiffs in addition to the depositions of Defendants Glenn
 15 Savage (Vol. 2) and Kim DiPasquale. Additional depositions of the person(s) most knowledgeable for
 16 Defendants, depositions of any percipient witnesses and lay witnesses; and additional Interrogatories,
 17 Requests for Admission and Requests for Production to Plaintiffs and Defendants (if necessary).
 18

19 **3. The reasons why the deadline was not satisfied:**

20 The plaintiffs' worked for the Southern Nevada Health District for approximately ten (10)
 21 years each. As such, the instant lawsuit alleges causes of actions pertaining to the history of the
 22 plaintiffs' employment that requires extensive investigation by all parties.
 23

24 Due to the large number of depositions that must occur in this case and handling scheduling
 25 conflicts among the parties and their counsel, not all depositions will be able to be scheduled within
 26 sufficient time before the current close of discovery deadline. In addition to the remaining
 27

1 defendants to be deposed (Glenn Savage, Vol. 2 and Kim DiPasquale), the plaintiffs anticipate taking
 2 the depositions of approximately ten (10) additional third-party witnesses.

3 It will be beneficial to have completed the remaining depositions prior to the initial expert
 4 disclosure in order for the experts to have all necessary information prior to the time of the initial
 5 disclosure deadline.
 6

7 Finally, as of Plaintiffs' 28th supplement to their initial disclosures, they have identified
 8 several hundred witnesses and have produced approximately 25,000 pages of documents.
 9 Completing depositions of the parties will be important to further narrow down those witnesses and
 10 documents.

11 **4. Proposed schedule for completing discovery:**

<u>Scheduled Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Discovery Deadline	October 5, 2015	Thursday, March 3, 2016
Amend Pleadings/Add Parties	August 3, 2015	Monday, December 5, 2016
Initial Expert Disclosure Deadline	August 3, 2015	Monday, December 5, 2016
Rebuttal Expert Deadline	September 4, 2015	Tuesday, February 2, 2016
Interim Status Report	August 3, 2015	Monday, December 5, 2016
Dispositive Motion Deadline	November 2, 2015	Monday, April 4, 2016
Pre-Trial Order (unless dispositive motions are filed, in which case the deadline shall be 30 days after decision of the dispositive motions or further order of the Court)	December 1, 2015	Wednesday, May 4, 2016
Last Day to Submit Motion and/or Stipulation to Extend Discovery	September 11, 2015	Friday, February 12, 2016

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27 ///

1 DATED this 31st day of July, 2015.

2 PARKER SCHEER LAGOMARSINO

4 /s/ Andre M. Lagomarsino, Esq.

Andre M. Lagomarsino, Esq.
5 9555 South Eastern Avenue, Suite 210
Las Vegas, Nevada 89123
6 *Attorney for Plaintiffs*

DATED this 31st day of July, 2015.

OLSON, CANNON, GORMLEY,
ANGULO & STOBERSKI

7 /s/ Peter Angulo, Esq.

WALTER CANNON, ESQ.
PETER ANGULO, ESQ.
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
8 *Attorneys for Defendants Savage, Irani, Labay,
Raiche-Curl, Newton*

9 DATED this 31st day of July, 2015.

10 FISHER & PHILLIPS LLP

11 /s/ Whitney Selert, Esq.

MARK RICCIARDI, ESQ.
12 WHITNEY SELERT, ESQ.
3800 Howard Hughes Parkway, Suite 950
13 Las Vegas, Nevada 89169
14 *Attorneys for Southern Nevada Health District,
Maceachern, Sands, Gunnoe and Dipasquale*

17 **ORDER**

18 IT IS SO ORDERED.

19 DATED this 31st day of July, 2015.

20
21
22 
23 UNITED STATES MAGISTRATE JUDGE
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28